

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF MASSACHUSETTS

FOUR WOMEN HEALTH SERVICES, LLC,  
Plaintiff

CIVIL ACTION No: 1:24-CV-12283-JEK

vs.

ABUNDANT HOPE PREGNANCY  
RESOURCE CENTER INC., d/b/a  
ATTLEBORO WOMEN'S HEALTH  
CENTER, CATHERINE ROMAN, NICOLE  
CARGES, DARLENE HOWARD, and  
CHOOSE LIFE MARKETING, LLC,

Defendants

**ANSWER OF DEFENDANTS, ABUNDANT HOPE PREGNANCY RESOURCE  
CENTER INC., D/B/A ATTLEBORO WOMEN'S HEALTH CENTER,  
CATHERINE ROMAN, NICOLE CARGES, AND DARLENE HOWARD TO  
PLAINTIFF'S AMENDED COMPLAINT**

1. The Defendants deny the allegations of this paragraph.
2. The Defendants admit the allegations of the first sentence of this paragraph. The Defendants deny the allegations of the second sentence of this paragraph.
3. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.
4. The Defendants deny the allegations of this paragraph.
5. The Defendants deny the allegations of this paragraph.
6. The Defendants deny the allegations of this paragraph.
7. The Defendants admit the allegations of this paragraph.
8. The Defendants admit the allegations of this paragraph.
9. The Defendants deny the allegations of this paragraph.

10. The Defendants deny the allegations of this paragraph.
11. The Defendants deny the allegations of this paragraph.
12. The Defendants deny the allegations of this paragraph.
13. The Defendants deny the allegations of this paragraph.
14. The Defendants deny the allegations of this paragraph.
15. The Defendants deny the allegations of this paragraph.
16. The Defendants deny the allegations of this paragraph.
17. The Defendants deny the allegations of this paragraph.
18. The Defendants deny the allegations of this paragraph.
19. The Defendants deny the allegations of this paragraph.
20. The Defendants admit the allegations of the first sentence of this paragraph.  
The Defendants deny the allegations of the second sentence of this paragraph.
21. The Defendants deny the allegations of this paragraph.
22. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.
23. The Defendants admit the allegations of this paragraph.
24. The Defendants admit the allegations of this paragraph.
25. The Defendants admit the allegations of this paragraph.
26. The Defendants admit the allegations of this paragraph.
27. The Defendants deny the allegations of this paragraph.
28. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.
29. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.
30. The Defendants admit the allegations of this paragraph.
31. The Defendants deny the allegations of this paragraph.

32. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

33. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

34. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

35. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

36. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

37. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

38. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

39. The Defendants admit the allegations of this paragraph.

40. The Defendants admit the allegations of this paragraph.

41. The Defendants admit the allegations of this paragraph.

42. The Defendants admit the allegations of this paragraph.

43. The Defendants admit the allegations of this paragraph.

44. The Defendants admit the allegations of this paragraph.

45. The Defendants admit the allegations of this paragraph.

46. The Defendants deny the allegations of this paragraph.

47. The Defendants deny the allegations of this paragraph.

48. The Defendants admit the allegations of this paragraph.

49. The Defendants admit the allegations of this paragraph.

50. The Defendants admit the allegations of this paragraph.

51. The Defendants deny the allegations of this paragraph.

52. The Defendants deny the allegations of this paragraph.

53. The Defendants admit the allegations of this paragraph in that that is what the cited website says.

54. The Defendants admit the allegations of this paragraph.

55. The Defendants admit the allegations of this paragraph.

56. The Defendants deny the allegations of this paragraph.

57. The Defendants deny the allegations of this paragraph.

58. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

59. The Defendants admit the allegations of this paragraph.

60. The Defendants deny the allegations of this paragraph.

61. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

62. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

63. The Defendants admit the allegations of this paragraph.

64. The Defendants admit the allegations of this paragraph.

65. The Defendants admit the allegations of this paragraph.

66. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

67. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

68. The Defendants lack information sufficient to form a belief about the truth of the allegations of the first sentence of this paragraph.

69. The Defendants lack information sufficient to form a belief about the truth of the allegations of the first sentence of this paragraph.

70. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

71. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

72. The Defendants deny the allegations of this paragraph.

73. The Defendants admit the allegations of this paragraph.

74. The Defendants admit the allegations of this paragraph.

75. The Defendants admit the allegations of this paragraph.

76. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

77. The Defendants admit the allegations of this paragraph.

78. The Defendants admit the allegations of this paragraph.

79. The Defendants admit the allegations of this paragraph.

80. The Defendants deny the allegations of this paragraph.

81. The Defendants deny the allegations of this paragraph.

82. The Defendants deny the allegations of this paragraph.

83. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

84. The Defendants deny the allegations of this paragraph.

85. The Defendants deny the allegations of this paragraph.

86. The Defendants deny the allegations of this paragraph.

87. The Defendants deny the allegations of this paragraph.

88. The Defendants deny the allegations of this paragraph.

89. The Defendants admit the allegations of this paragraph.

90. The Defendants admit the allegations of this paragraph.

91. The Defendants admit the allegations of this paragraph.

92. The Defendants admit the allegations of this paragraph.

93. The Defendants deny the allegations of this paragraph.

94. The Defendants admit the allegations of the first sentence of this paragraph. The Defendants deny the allegations of the second sentence of this paragraph.

95. The Defendants deny the allegations of this paragraph.

96. The Defendants deny the allegations of this paragraph.

97. The Defendants deny the allegations of this paragraph.

98. The Defendants deny the allegations of this paragraph.

99. The Defendants deny the allegations of the first sentence of this paragraph. The Defendants admit deny the allegations of the second sentence of this paragraph.

100. The Defendants deny the allegations of this paragraph.

101. The Defendants deny the allegations of this paragraph.

102. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

103. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

104. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

105. The Defendants deny the allegations of this paragraph.

106. The Defendants deny the allegations of this paragraph.

107. The Defendants deny the allegations of this paragraph.

108. The Defendants deny the allegations of this paragraph.

109. The Defendants deny the allegations of the first sentence of this paragraph. The Defendants admit the allegations of the second sentence of this paragraph. The Defendants lack information sufficient to form a belief about the truth of the additional allegations of this paragraph.

110. The Defendants deny the allegations of the first sentence of this paragraph. The Defendants lack information sufficient to form a belief about the truth of the additional allegations of this paragraph.

111. The Defendants deny the allegations of this paragraph.

112. The Defendants deny the allegations of this paragraph.

113. The Defendants deny the allegations of this paragraph.

114. The Defendants deny the allegations of this paragraph.

115. The Defendants admit the allegations of this paragraph.

116. The Defendants admit the allegations of this paragraph.

117. The Defendants deny the allegations of this paragraph.

118. The Defendants deny the allegations of this paragraph.

119. The Defendants admit the allegations of this paragraph.

120. The Defendants deny the allegations of this paragraph.

121. The Defendants deny the allegations of this paragraph.

122. The Defendants lack information sufficient to form a belief about the truth of the allegations of the first sentence of this paragraph. The Defendants deny the allegations of the second sentence of this paragraph.

123. The Defendants deny the allegations of this paragraph.

124. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

125. The Defendants deny the allegations of this paragraph.

126. The Defendants deny the allegations of this paragraph.

127. The Defendants deny the allegations of this paragraph.

128. The Defendants deny the allegations of the first sentence of this paragraph. The Defendants lack information sufficient to form a belief about the truth of the allegations of the second sentence of this paragraph.

129. The Defendants deny the allegations of this paragraph.

130. The Defendants deny the allegations of this paragraph.

131. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

132. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

133. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

134. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

135. The Defendants admit the allegations of this paragraph.

136. The Defendants deny the allegations of the first sentence of this paragraph. The Defendants admit the allegations of the second sentence of this paragraph.

137. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

138. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

139. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

140. The Defendants deny the allegations of this paragraph.

141. The Defendants deny the allegations of this paragraph.

142. The Defendants admit the allegations of this paragraph.

143. The Defendants admit the allegations of this paragraph.

144. The Defendants deny the allegations of this paragraph.

145. The Defendants deny the allegations of this paragraph.

146. The Defendants deny the allegations of this paragraph.

147. The Defendants deny the allegations of this paragraph.

148. The Defendants deny the allegations of this paragraph.

149. The Defendants deny the allegations of this paragraph.

150. The Defendants deny the allegations of this paragraph.

151. The Defendants deny the allegations of this paragraph.

152. The Defendants deny the allegations of this paragraph.

153. The Defendants deny the allegations of this paragraph.

154. The Defendants deny the allegations of this paragraph.



155. The Defendants lack information sufficient to form a belief about the truth of the allegations of the first sentence of this paragraph. The Defendants deny the allegations of the second sentence of this paragraph.

156. The Defendants admit the allegations of this paragraph.

157. The Defendants deny the allegations of this paragraph.

158. The Defendants deny the allegations of this paragraph.

159. The Defendants deny the allegations of this paragraph.

160. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

161. The Defendants admit the allegations of the first sentence of this paragraph. The Defendants deny the allegations of the second sentence of this paragraph.

162. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

163. The Defendants deny the allegations of this paragraph.

164. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

165. The Defendants admit the allegations of this paragraph.

166. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

167. The Defendants deny the allegations of this paragraph.

168. The Defendants deny the allegations of this paragraph.

169. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

170. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

171. The Defendants deny the allegations of the first sentence of this paragraph. The Defendants lack information sufficient to form a belief about the truth of the allegations of the second sentence of this paragraph.

172. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

173. The Defendants deny the allegations of this paragraph.

174. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

175. The Defendants deny the allegations of this paragraph.

176. The Defendants deny the allegations of the third sentence of this paragraph. The Defendants lack information sufficient to form a belief about the remaining allegations of this paragraph.

177. The Defendants deny the allegations of the first and third sentences of this paragraph. The Defendants lack information sufficient to form a belief about the remaining allegations of this paragraph.

178. The Defendants deny the allegations of the first and fourth sentences of this paragraph. The Defendants lack information sufficient to form a belief about the remaining allegations of this paragraph.

179. The Defendants deny the allegations of the first and third sentences of this paragraph. The Defendants admit the allegations of the second and fourth sentences of this paragraph.

180. The Defendants admit the allegations of this paragraph.

181. The Defendants restate their answers to the allegations contained in paragraphs 1-180 of the amended complaint.

182. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

183. The Defendants deny the allegations of this paragraph.

184. The Defendants deny the allegations of this paragraph.

185. The Defendants deny the allegations of this paragraph.

186. The Defendants deny the allegations of this paragraph.

187. The Defendants deny the allegations of this paragraph.

188. The Defendants deny the allegations of this paragraph.

189. The Defendants restate their answers to the allegations contained in paragraphs 1-188 of the amended complaint.

190. The Defendants deny the allegations of this paragraph.

191. The Defendants deny the allegations of this paragraph.

192. The Defendants deny the allegations of this paragraph.

193. The Defendants deny the allegations of this paragraph.

194. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

195. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

196. The Defendants admit the allegations of this paragraph.

197. The Defendants lack information sufficient to form a belief about the truth of the allegations of this paragraph.

198. The Defendants admit the allegations of this paragraph.

199. The Defendants deny the allegations of this paragraph.

200. The Defendants deny the allegations of this paragraph.

201. The Defendants deny the allegations of this paragraph.

The Defendants deny that the Plaintiff is entitled to judgment against them and deny that the Plaintiff is entitled to any relief against them.

### **AFFIRMATIVE DEFENSES**

The Plaintiff's complaint must be dismissed since the Defendants are not subject to M. G. L. ch. 93A, Sec. 11 because at no time were they engaged in trade or commerce.

The Plaintiff's complaint must be dismissed since the Defendants are not subject to the Lanham Act, 15 U.S.C. Sec. 1125, *et seq.*, because at no time were they engaged in trade or commerce.

The Plaintiff's complaint must be dismissed since the Defendants are not subject to the Lanham Act, 15 U.S.C. Sec. 1125, *et seq.*

The Plaintiff's complaint must be dismissed under Fed. R. Civ. P. 12(b) (6) because it failed to state claims upon which relief can be granted.

The Plaintiff's complaint must be dismissed because this court lacks subject matter jurisdiction over the Plaintiff's claims.

The Plaintiff's complaint must be dismissed because the Plaintiff lacks standing.

**DEMAND FOR JURY TRIAL**

The Defendants demand a jury trial on all counts so triable.

The Defendants, Abundant Hope Pregnancy  
Resource Center, d/b/a Attleboro Women's Health  
Center, Catherine Roman, Nicole Carges, and  
Darlene Howard,  
By Their Attorney,

/s/ Thomas M. Harvey

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Tel. 617-710-3616; Fax 781-643-1126  
tharveyesq@aol.com  
BBO#: 225050

Date: 1-22-25

**CERTIFICATE OF SERVICE**

I, Thomas M. Harvey, certify that on January 22, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Plaintiff by electronically serving its counsel of record.

/s/ Thomas M. Harvey

Thomas M. Harvey